

**REMARKS**

Claims 2, 3 and 4 are pending in this Application. Claim 1 has been cancelled, new claim 4 added and the dependency of claims 2 and 3 appropriately changed. Care has been exercised to avoid the introduction of new matter. Indeed, adequate descriptive support for the present Amendment should be apparent throughout the originally filed disclosure including original claim 1. Applicants submit that the present Amendment does not generate any new matter issue.

**Claims 1 and 2 were rejected under 35 U.S.C. § 103 for obviousness predicated upon the acknowledged prior art in view of Konishi and Ohtsuka et al.**

In the statement of the rejection the Examiner admitted shortcomings in the acknowledged prior art, but concluded that one having ordinary skill in the art would somehow have been motivated to modify the acknowledged prior art to arrive at the claimed invention predicated upon Konishi and Ohtsuka et al. This rejection is traversed.

Initially, Applicants will treat this rejection as though applied against claims 4 and 2, because claim 1 has been cancelled and claim 4 added to replace claim 1.

Secondly, Applicants submit that there are significant differences between the interface module defined in independent claim 1 and the prior art that undermine the obviousness conclusion under 35 U.S.C. § 103.

Specifically, the present invention addresses problems attendant upon the use of complex cables in interface modules characteristic of the prior art. Such problems include transmission errors, inability to accurately identify video outlet displays, the undue amount of time required to structure connectors, increased cable size and complexities in cost attendant upon such prior art

practices. The present invention addresses and solves such problems by enabling long distance transmission of video signals without using a composite cable with its attendant problems.

In accordance with the present invention, an interface module is provided wherein an outer diameter of connectors in a 4-core optical cable unit, disposed between a transmitting interface unit and receiving interface unit, is reduced. Such a reduction is achieved employing optical connectors without electrical terminals. Further, the optical cable unit itself has a small diameter and flexibility vis-à-vis a composite cable which includes an optical fiber and electric wire. Such an optical cable is relatively easy to install in a duct.

To achieve the advantages of the present invention, a conventional interface module (Fig. 4A) is separated into three units: (1) a transmitting interface unit; (2) a receiving interface unit; and (3) a cable unit. Further, in accordance with the present invention, the transmitting interface unit includes an E/O and the receiving unit includes an O/E. Such a configuration enables a reduction in a cable unit and simplification of the structure and small diameters. No such structure is disclosed or suggested by any of the applied references.

Based upon the foregoing distinctions, it should be apparent that even if the applied references are combined as suggested by the Examiner, and Applicants do not agree that the requisite fact-based motivation has been established, the claimed invention would not result.

*Uniroyal, Inc. v. Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988).*  
Applicants, therefore, submit that the imposed rejection of claims 1 and 2 (presumably now claims 4 and 2) under 35 U.S.C. § 103 for obviousness predicated upon the acknowledged prior art in view of Konishi and Ohtsuka et al. is not factually or legally viable and, hence, solicit withdrawal thereof.

**Claim 3 was rejected under 35 U.S.C. § 103 for obviousness predicated upon the acknowledged prior art in view of Konishi, Ohtsuka et al. and Mosely et al.**

This rejection is traversed.

Claim 3 depends upon claim 4. Applicants incorporate herein the arguments previously advanced in traversing the imposed rejection of claim 4 under 35 U.S.C. § 103 for obviousness predicated upon the acknowledged prior art in view of Konishi and Ohtsuka et al. The additional reference to Mosely et al. does not cure the previously argued deficiencies in the attempted combination of the acknowledged prior art, Konishi and Ohtsuka et al.

Applicants, therefore, submit that the imposed rejection of claim 3 under 35 U.S.C. § 103 for obviousness predicated upon the acknowledged prior art in view of Konishi, Ohtsuka et al. and Mosely et al. is not factually or legally viable and, hence, solicits withdrawal thereof.

**New claim 4.**

New claim 4 is free of the applied prior art for reasons previously argued. Applicants would note that the rejection of claim 1 was treated as though applied against claim 4 and the patentability of claim 4 argued.

Based upon the foregoing it should be apparent that the imposed rejections have been overcome, and that all pending claims are in condition for immediate allowance. Favorable consideration is, therefore, solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper,

**Application No.: 10/761,306**

including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP



Arthur J. Steiner  
Registration No. 26,106

600 13<sup>th</sup> Street, N.W.  
Washington, DC 20005-3096  
Phone: 202.756.8000 AJS:bjs:ntb  
Facsimile: 202.756.8087  
**Date: December 5, 2005**

**Please recognize our Customer No. 20277  
as our correspondence address.**